

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ABBY B. CONLEY,

Plaintiff

JURY TRIAL DEMANDED

v.

COUNTY OF ERIE, ERIE COUNTY OFFICE OF
CHILDREN AND YOUTH, a/k/a ERIE COUNTY
CHILD WELFARE SERVICE, RICHARD
SCHENKER, individually and in his capacity as County
Executive of Erie County, Pennsylvania, PETER
CALLAN, individually and in his capacity as Erie
County Director of Personnel, DEBRA LIEBEL,
individually and in her capacity as Executive Director,
Erie County Office of Children and Youth, a/k/a Erie
Child Welfare Service and JOHN A. ONORATO,
ESQUIRE, individually and in his capacity as Erie
County Solicitor,

Civil Action No.: 05-76E

The Honorable Sean J. McLaughlin

Defendants

**MOTION OF COUNSEL FOR JOHN A. ONORATO, ESQUIRE
TO BE EXCUSED FROM ATTENDING STATUS CONFERENCE**

AND NOW comes the Defendant, John A. Onorato, Esquire, by and through his attorneys, Dell, Moser, Lane & Loughney, LLC, and Mark R. Lane, Esquire, and moves this Honorable Court to be excused from attendance at the Status Conference scheduled for May 16, 2006:

1. This action was filed on behalf of Abby Conley against Erie County, Erie County Office of Children and Youth, Richard Schenker, County Executive of Erie County, Peter Callan, Erie County Director of Personnel, Debra Liebel, Executive Director of the Erie County Office of Children and Youth, and John Onorato, Erie County Solicitor.

2. A settlement was negotiated in this matter on behalf of all parties.

3. In addition to monetary payments, Plaintiff and the County of Erie negotiated an Agreement to re-employ Plaintiff in a job to be determined by the County.


4. This Defendant cannot implement the Agreement pertaining to Plaintiff's reemployment with the County of Eire, as he is no longer the Solicitor.

5. Counsel for this Defendant believes that his absence will not materially alter or affect the proceedings scheduled by the Court on May 16, 2006.

WHEREFORE, Defendant, John A. Onorato, Esquire, respectfully requests that his counsel be excused from attending the May 16, 2006, Status Conference or alternatively be allowed to participate by telephone.

Respectfully submitted,

DELL MOSER LANE & LOUGHNEY, LLC

By 
Mark R. Lane, Esquire
Attorney for Defendant,
John A. Onorato, Esquire
PA ID No. 61923
525 William Penn Place
Suite 3700
Pittsburgh, PA 15219
412-471-1180 – Phone
412- 471-9012 - Fax

CERTIFICATE OF SERVICE

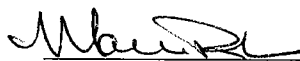
I hereby certify that a true and correct copy of the within **Motion of Counsel for John A. Onorato, Esquire to be Excused from Attending Status Conference** has been served upon all counsel of record by electronic mail, this 12th day of May, 2006 as follows:

Anthony Angelone, Esquire
Vendetti & Vendetti
3820 Liberty Street
Erie, PA 16509
Counsel for Plaintiff

Timothy D. McNair, Esquire
Law office of Timothy D. McNair
821 State Street
Erie, PA 16501
Counsel for Plaintiff

Edmond Joyal, Esquire
The Law Office of Joseph S. Weimer
975 Two Chatham Center
Pittsburgh, PA 15219
*Counsel for Richard Schenker, Peter Callan and Debra Liebel
Individual Capacity Only*

Richard A. Lanzillo, Esquire
Knox, McLaughlin, Gornall & Sennett, P.C.
120 West 10th Street
Erie, PA 16501
*Counsel for County of Erie and
Richard Schenker, Peter Callan and Debra Liebel
Official Capacity Only*



Mark R. Lane, Esquire
Attorney for Defendant,
John A. Onorato, Esquire